

ANN MITCHELL,

Plaintiff,

v.

HALLMARK HEALTH SYSTEM, INC./
LAWRENCE MEMORIAL HOSPITAL
and JULIE CHASE SHAUGHNESSY,

Defendants.

Pursuant to Fed. R. Civ. P. 16(b) and (c), Local Rule 16.1 and the Court's October 21, 2004 Notice of Scheduling Conference, the parties hereby respectfully submit their Joint Statement.

- A. Status of Motions to Dismiss and to Amend Complaint
- B. Parties' Proposed Pretrial Schedule
- C. Status of Settlement Discussions

A.	Motion to Amend Complaint Granted	Immediately
B.	Motion to Dismiss Amended Complaint Filed	December 31, 2004
C.	Opposition to Motion to Dismiss Filed	January 31, 2005
D.	Hearing on Motion to Dismiss	c. February, 2005
E.	Initial Disclosures Served	March 1, 2005

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| F. | Fact Discovery Complete | September 1, 2005 |
| G. | At Court's and Parties' Discretion, Attendance
At Settlement Conference | c. October, 2005 |
| H. | Motions for Summary Judgment Filed | October, 1, 2005 |
| I. | Opposition to Summary Judgment Motions Filed | November 1, 2005 |
| J. | Expert Witness Reports Filed (if necessary) | Within 30 days of Court's
summary judgment decision |
| K. | Expert Discovery Complete (if necessary) | Within 30 days of date
expert witness Reports due |

III. TRIAL BY MAGISTRATE JUDGE

The parties do not agree to a trial before a Magistrate Judge.

IV. CERTIFICATIONS

Signed certifications, in accordance with Local Rule 16.1(D)(3), will be filed on behalf of the parties at or before the Scheduling Conference.

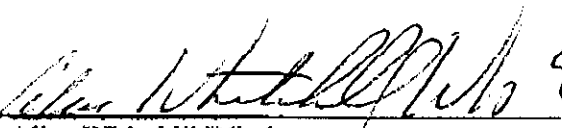
Respectfully submitted,

ANN MITCHELL

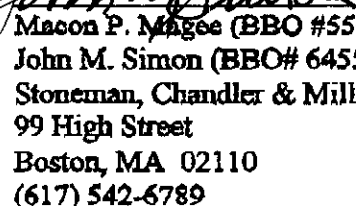
By her attorney,

HALLMARK HEALTH SYSTEM, INC./
LAWRENCE MEMORIAL HOSPITAL
and JULIE CHASE SHAUGHNESSY

By their attorneys,


Alice Whitehill Wiseberg
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Dated: November 24, 2004


Macon P. Magee (BBO #550602)
John M. Simon (BBO# 645557)
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Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (_____) on 11-24-04.

